

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

REC'D

TROY LAMONT MOORE, SR.,
Plaintiff

: CIVIL ACTION NO. 14-3873

AUG - 6 2015

v.

LOUIS GIORLA, et al.,
Defendants

ORDER

AND NOW, this _____ day of _____, 2015, it is HEREBY ORDERED that the Motion of Plaintiff for Summary Judgment be Granted. The summary judgment be entered in favor of Troy Lamont Moore, Sr., and against Defendants Louis Giorla, Claudette Martin, Corrections Officer S. Walton better known as Walden and Margaret McGrogan, Rn Nurse and their summary judgment be denied.

BY THE COURT:

Robreno, J.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TROY LAMONT MOORE, SR., : CIVIL ACTION NO. 14-3873
Plaintiff :

v. :

LOUIS GIORLA, et al., :
Defendants :

FILED

AUG - 6 2015

MICHAEL J. KUNZ, Clerk
By _____ Dep. Clerk

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 56

Plaintiff, Troy Lamont Moore, Sr., hereby file this motion for ---
summary judgment pursuant to Rule 56 of the Federal Rules of Civil
Procedure.

Pursuant to Local 7.1, plaintiff hereby incorporate an attached
Memorandum of Law.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TROY LAMONT MOORE, SR., : CIVIL ACTION NO. 14-3873
Plaintiff :

v. :

LOUIS GIORLA, et al., :
Defendants :

PLAINTIFF'S BRIEF FOR PRELIMINARY OBJECTIVE OF
DEFENDANT MARGARET MCGROGAN'S MOTION FOR SUMMARY
JUDGMENT TO BE DENIED

I. STATEMENT OF THE CASE

Pro-se plaintiff, Troy Lamont Moore, Sr., a state prisoner currently incarcerated at SCI-Forest filed this civil action against Defendants Louis Giorla, Claudette Martin, Corrections Officer S. Walton better known as Walden and Margaret McGrogan, Rn Nurse. This memorandum of law in support of his motion for summary judgment pursuant to Rule 56 (d) of the Federal Rules of Civil Procedures & Local Rule 7.

On June 23, 2014, plaintiff filed this lawsuit being granted to proceed *informa pauperis*. See, Doc. 1. Plaintiff filed a Complaint on June 26, 2014 against Defendants alleging that the toilet in his cell 18 at Philadelphia Industrial Correctional Center (PICC) overflowed on September 16, 2013. Which he was not allowed out of his cell for more than eight (8) hours. The video footage will support plaintiff's claims that was available to inspect. See, Compl. Doc. 3. Plaintiff also alleges that he suffered from shortness of breath, vomiting, diarrhea and a facial rash as a result of his exposure to sewage. Id. at page 6, ¶3. Plaintiff received inadequate medical care and alleged that defendants failed to assist him to receive appropriate medical care.

Deliberate Indifference does apply to defendant McGrogan because she was informed on 9-17-2013 that plaintiff has been dignosed with CAD (Corinary Artery Disease) and was in distress at the time.

Plaintiff is prescribed Nitro Glycerin PRN (Per request needed) and upon request of said medication that plaintiff was denied issuance.

Evidence of denial of life saving medication can be referenced on page three, paragraph "D" of the original complaint delivered to prison authorities 6-15-2014.

Per the PICC Correctional Facility's guide lines and regulations, an inmate cannot utilize the medical departments services with out filing a sick call unless the incident constitute an emergency, ie; stroke, heart attack or assault. Plaintiff was ent directly to medical.

Injuries sustained due to defendant McGrogan's gross lack of care care plāintiff to remained in distress for several hours after the refusal of medication by defendant McGrogan.

On Tuesday, July 21, 2015 till Thursday, July 23, 2015 at SCI-Forest this institution was lock down. On Tuesday, July 28, 2015, at SCI-Forest their law library was closed. It is imperative that plaintiff make this court aware of his matter at this institution. Therefore, plaintiff response has been filed timely as required.

II. ARGUMENT

A. MOORE HAS STATE A CONSTITUTIONAL CLAIM AGAINST S. WALTON BETTER KNOWN AS WALDEN TO SUPPORT HIS MOTION FOR SUMMARY JUDGMENT

Moore filed this action against defendant Walton better known as Walden alleging that his constitutional rights were violated on September 16, 2013 regarding is cell 18 toilet overflowing with feces and urine. The inside plaintiff's cell was in fact saturated with the fumes of feces and urine.. Which could undermine health and sanitation. See, Kelley v. Boro, 60 F.3d 664, 666-67 (9th cir. 1996). No qualified immunity where defendant Walton failed to remove plaintiff from cell 18 after plaintiff complained about fumes. Which was a violation of plaintiff's Eighth Amendment. Plaintiff seeks redress against defendant Walton pursuant to 42 U.S.C. 1983.. See, attached Exhibit 1.

"A[n individual government] defendant in a civil rights actions must have personal involvement in the alleged wrongdoing; liability can be predicated on defendant Walton personal involvement. See, Rode v. Dellarciprete, 845 F.2d 1195, 1207 (3d Cir. 1988). The Third Circuit has held that a civil rights complaint is adequate where it states the conduct, time, place and persons responsible. See, Evancho v. Fisher, 423 F.3d 347, 353 (3d. Cir. 2005); See, Boykins v. Ambridge Area Sch. Dist. 621 F.2d 75, 80 (3d Cir. 1980) (citing Hall v. Pa. State Police, 570 F.2d 86, 89 (3d Cir. 1978)

It is so true that the Prison Litigation Reform Act (PLRA), Under 42 U.C.S. §1997e (e), provides a limitation on the award of monetary damages. This was defendants reason for failing to comply with plaintiff's subpoenas for the deposition to be deposed. The defendants are facing sanctions due to their actions. Plaintiff has demonstrated an appropriate act by defendants to comply to subpoenas to be deposed to support the third circuit requirements in order to be awarded compensatory damages for physical injury. With headaches, stomach cramps, chest pain and nervousness.

The U.S. Supreme Court explained what deliberate indifference means in its 1994 decision *Farmer v. Brennan*.

In *Farmer*, the Supreme Court held that an official acts with deliberate indifference when she or he "knows harm that inmates as like plaintiff face a substantial risk of serious harm and disregards that risk by failing to take reasonable measures to abate it.

Basic human needs that the courts recognize which is sanitation and hygiene. A severe or prolonged lack of sanitation can violate the constitution. Inmates as like plaintiff have a right to a basic level of sanitation where they live and work. A basic level of sanitation involves several things, including a working toilet in each cell in which an inmate as like plaintiff is confined.

Plaintiff seeks for relief in Monetary Damages against Corrections Officer S. Walton better known as Walden in the amount of Thirty Five Thousand Dollars and in Punitive Damages in the amount of Fifty Thousand Dollars. See, attached Exhibit 2.

B. MOORE HAS STATE A CONSTITUTIONAL CLAIM AGAINST DEFENDANT MCGROGAN, R.N. TO SUPPORT HIS MOTION FOR SUMMARY JUDGMENT

Moore filed this action against defendant McGrogan alleging that his constitutional rights were violated on September 17, 2013 regarding not being treated for fumes of feces and urine. The denial of medical care endanger plaintiff which cause unnecessary pain.

Element of Medical Care Claim:

Like the right of plaintiff to be protected from assault by other inmates, deliberate indifference is a critical part of any medical care claim. Here is the rule.

Jail & prison officials violate the constitution when they act with deliberate indifference to an inmate's serious medical needs. The inside plaintiff's cell was in fact saturated with the fumes of feces and urine. See, Exhibit 1 as evidence that will show plaintiff's cell 18 toilet overflowing.

See, Exhibit 2 as evidence that will show plaintiff's cell 18 was fixed by Mr. Kohenklein. Cell 18 was being washed down by bleach & floor being washed and dried. Which was due to fumes of feces and urine. Plaintiff went to medical the defendant McGrogan place on plaintiff's finger, a finger monitor. Defendant McGrogan instructed plaintiff to return back to his unit

"A[n individual government] defendant in a civil rights actions must have personal involvement in the alleged wrongdoing; liability can be predicated on defendant McGrogan personal involvement receiving inadequate medical care for feces and urine. See, Rode v. Dellarciprete, (3d cir. 1988). The Third Circuit has held that a civil rights complaint is adequate where it states the conduct, time, place and person responsible. See, Evancho v. Fisher, 423 F.3d 347, 353 (3d cir. 2005).

The Defendant McGrogan was also responsible for information that plaintiff gave concerning his health disorder during his examination. Which was shortness of breath, throwing up of raw sewage for several hours. See, Exhibit 4 plaintiff's sick call request document which stated the following:

Medical Problem (be specific): Shortness of breath, throwing up, Diarrhea, Rash (Facial & Arms) due to exposure of Raw Sewage for several hours. Which was dated 9-17-2013 at 1:15..

Plaintiff seeks for relief in monetary damages against Defendant Margaret McGrogan, RN in that amount of Thirty Five Thousand Dollars and Punitive Damages in the amount of Fifty Thousand Dollars.

C. MOOORE HAS EXHAUSTED HIS ADMINISTRATIVE REMEDIES
BY APPEALING THE DENIAL OF INITIAL GRIEVANCE

Standards for grievance procedure in jails contained in this subchapter were applicable to action by pretrial detainee of county jail against county sheriff and two of his subordinate officers under the Civil Rights Act of 1871. Tyra v. Harger, D.C.Ind 1984, 587 F.Supp. 1336. The plaintiff exhausted his administrative remedies as required. See, Jackson v. Cain, C.A.5 (La) 1989, 864 F.2d 1235.

The plaintiff seeks relief to be granted regarding Exhausted of his Administrative Remedies.

D. MOORE HAS STATE A CONSTITUTIONAL CLAIM AGAINST DEFENDANT LOUIS GIORLA TO SUPPORT HIS MOTION FOR SUMMARY JUDGMENT

Moore filed this action against defendant Giorla alleging that his constitutional rights were violated denying plaintiff to video footage to support his claims. Defendant Giorla failed to preserve video footage which would have shown how long plaintiff was in cell 18 inhaling feces and urine on September 16, 2013. Spoliation of Evidence has occurred in this case caused by defendant Giorla due to plaintiff instructed Giorla to preserve video for litigation purposes. See, Taylor v. City of New York, U.S.D.C (S.D. NY) case No. 1:12-cv-05881-RPP.

Plaintiff served defendant Giorla a subpoena to be deposed to bring with Giorla for deposition the video footage. The defendant Giorla failed to appear at a deposition under subpoena. Sanctions are pending against defendant Giorla supporting facts for spoliation of evidence; (i.e. video footage). Defendant Giorla attorney stated on April 6, 2015 conference that the video footage was erased due to plaintiff not giving notification to preserve within 30 days after the initial 9-16-2013 incident. Notification was directly given and confirmed with both defendant Giorla and Claudette Martin. Which can be confirmed with the 10-14-2013 grievance that shows only a 17 day lapse.

The Court shall render summary judgment if the pleadings, depositions, answers to interrogatories and admissions on file with documents and affidavits showing that there are genuine issues as to material fact. And plaintiff is entitled to a judgment as a matter of law. See, --- Fed.R.Civ.P. Rule 56.

"A[n individual government] defendant in a civil rights action must have personal involvement in the alleged wrongdoing of spoliation of evidence; liability can be predicated on defendant Giorla personal involvement. See, Rode v. Dellarciprete, 845 F.2d 1195, 1207 --- (3d Cir. 1988). The Third Circuit has held that a civil rights complaint is adequate where it states the conduct, time, place and persons responsible. See, Evancho v. Fisher, 423 F.3d 347, 353 (3d Cir. 2005).

Plaintiff seeks for relief in monetary damages against Defendant Louis Giorla in the amount of Thirty Five Thousand Dollars and Punitive Damages in the amount of One Hundred Thousand Dollars.

F. MOORE HAS STATE A CONSTITUTIONAL CLAIM AGAINST DEFENDANT CLAUDETTE MARTIN FOR MOTION FOR SUMMARY JUDGMENT

Moore filed this action against defendant Martin alleging that his constitutional rights were violated denying plaintiff to video footage to support his claims. Defendant Martin failed to preserve video footage which would have shown how long plaintiff was in cell 18 inhaling feces and urine on September 16, 2013. Spoliation of Evidence has occurred in this case caused by defendant Martin due to plaintiff instructed Martin to preserve video footage for litigation purposes. See, ----- Taylor v. City of New York, U.S.D.C. (S.D. NY) case No. 1:12-cv-05881-RPP.

Plaintiff served defendant Martin a subpoena to be deposed to produce video footage for the deposition. The defendant Martin failed to appear at a deposition under subpoena. Sanctions are pending against defendant Martin supporting facts for spoliation of evidence; (i.e. video footage). Defendant Martin attorney stated on April 6, 2015 conference that the video footage was erased due to plaintiff not giving notification to preserve within 30 days after the initial 9-16-2013 incident. Notification was directly given and confirmed with both defendants Martin and Giorla. Which can be confirmed with the 10-14-2013 grievance that shows on a 17 day lapse.

The Court shall render summary judgment if the pleadings, depositions, answers to interrogatories and admissions on file with documents and affidavits showing that there are genuine issues as to material fact. And plaintiff is entitled to a judgment as matter of law. See, Fed.R.Civ.P. Rule 56.

"A[n individual government] defendant in a civil rights action must have personal involvement in the alleged wrongdoing of spoliation of evidence; liability can be predicated on defendant Martin personal involvement. See, Rode v. Dellarciprete, 845 F.2d 1195, 1207 ---- (3d Cir. 1988). The Third Circuit has held that a civil rights complaint is adequate where it states the conduct, time, place and persons responsible. See, Evancho v. Fisher, 423 F.3d 347, 353 (3d Cir. 2005).

Plaintiff seeks for relief in monetary damages against Defendant Claudette Martin in the amount of Thirty Five Thousand Dollars and Punitive Damages in the amount of One Hundred Thousand Dollars.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TROY LAMONT MOORE, SR. : Civil Action No. 14-3873
Plaintiff :
v. :
LOUIS GIORLA, et al., :
Defendants :

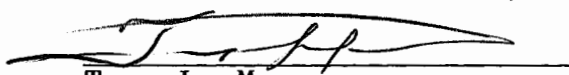
CERTIFICATE OF SERVICE

I, Troy L. Moore, hereby certify that on July 28, 2015, I caused a copy of Plaintiff's Brief for Preliminary Objective of Defendant McGrogan's Motion for Summary Judgment to be Denied to be served upon the persons indicated below Via first class mail postage prepaid.

Aaron Shotland, Esquire
City of Philadelphia Law Department
1515 Arch Street
14th Floor
Philadelphia, Pa 19102

Alan S. Gold, Esquire
261 Old York Road
Suite 526
Jenkintown, Pa 19046

RESPECTFULLY SUBMITTED,


Troy L. Moore
FE-2483
SCI-Forest
P.O. Box 945
Marienville, Pa 16239

MR 8



SICK CALL REQUEST

Check one: _____ Dental _____ Medical ☒ Mental HealthName: TROY L MOORE SR. Inmate I.D. Number 853 403
(Print Name)

Social Security No. _____

Housing Unit: 62 CELL 18Medical Problem (be specific): REQUESTING TO SEE MR. GEE
TO DISCUSS ONGOING PSYCH ISSUES
ASAP! PTSD PROBLEM HAS REOCCURED
SINCE TRAUMATIC INCIDENT ON 9-16-13Inmate's Signature [Signature] Date: 9-25-13 Time: 2:50 PM

FOR MEDICAL UNIT USE ONLY

Disposition: _____

Provider's Signature: _____ Date: _____ Time: [Signature]

MR 9



SICK CALL REQUEST

Check one: _____ Dental ☒ Medical _____ Mental HealthName: TROY L. MOORE SR. Inmate I.D. Number 853 403
(Print Name)

Social Security No. _____)

Housing Unit: G2 Cell 18Medical Problem (be specific): SHORTNESS OF BREATH, THROWING UP,
DIARRHEA, RASH (FACIAL & ARMS) DUE TO EXPOSURE
OF RAW SEWAGE FOR SEVERAL HOURSInmate's Signature [Signature] Date: 9-17-13 Time: 1:15

FOR MEDICAL UNIT USE ONLY

Disposition: _____

Provider's Signature: A. [Signature] Date: 9/18/15 Time: 9:10 AM



SICK CALL REQUEST

Check one: ☐ Dental ☒ Medical ☐ Mental HealthName: TROY L. MOORE SR. Inmate I.D. Number 853 403
(Print Name)Social Security No. Housing Unit: 62 Cell 18Medical Problem (be specific): SHORTNESS OF BREATH, THROAT LIP,
WHEEZING, RASH (FACIAL & ARMS) - DUE TO EXPOSURE
OF RAW SEWAGE FOR SEVERAL HOURSInmate's Signature [Signature] Date: 9-17-13 Time:

FOR MEDICAL UNIT USE ONLY

Disposition: Provider's Signature: Date: Time:

86-146



SICK CALL REQUEST

Check one: ☐ Dental ☒ Medical ☐ Mental HealthName: TROY L. MOORE SR. Inmate I.D. Number 853 403
(Print Name)Social Security No. Housing Unit: 62 Cell 18Medical Problem (be specific): STILL SUFFERING FROM HEAD ACHES,
PLEASE RENEW MOTRIN SCRIPT FOR MED LINEInmate's Signature [Signature] Date: 10/5/13 Time: 3:00 PM

FOR MEDICAL UNIT USE ONLY

Disposition: Provider's Signature: Date: Time:



SICK CALL REQUEST

Ed HEBET
2-BCheck one: _____ Dental _____ Medical ☒ Mental HealthName: TROY L MOORE SR. Inmate I.D. Number 853 403
(Print Name)

Social Security No. _____

Housing Unit: 62 CELL 18Medical Problem (be specific): REQUESTING TO SEE MR. GEE
TO DISCUSS ONGOING PSYCH ISSUES
ASAP! PTSD PROBLEM HAS REOCCURED
SINCE TRAUMATIC INCIDENT ON 9-16-13Inmate's Signature [Signature] Date: 9-25-13 Time: 2:50 PM

FOR MEDICAL UNIT USE ONLY

Disposition: _____

Provider's Signature: _____ Date: _____ Time: _____

86-146

TROY LAMONT MOORE, SR.

<p style="text-align: right;">58</p> <p>1 A. It is the following day.</p> <p>2 Q. And you weren't complaining of shortness of</p> <p>3 breath then?</p> <p>4 A. Okay. If that's what it says, that's what</p> <p>5 it says.</p> <p>6 Q. Don't you remember -- you have no memory of</p> <p>7 the following day what your symptoms were?</p> <p>8 A. You're asking -- what you're doing is</p> <p>9 you're asking me to remember something from a year</p> <p>10 and a half ago to today. Is that what you're</p> <p>11 asking?</p> <p>12 Q. I'm asking what symptoms in this traumatic</p> <p>13 event in your life you were having the next day?</p> <p>14 A. Okay. I was having stomach problems. I</p> <p>15 was still vomiting. I was having diarrhea and</p> <p>16 severe headaches.</p> <p>17 Q. You weren't having chest pains, you weren't</p> <p>18 having shortness of breath?</p> <p>19 A. No. The next day, which was the 17th,</p> <p>20 which would be the day before, chest pains subsided</p> <p>21 that afternoon even though I was denied the</p> <p>22 Nitroglycerin.</p> <p>23 Q. The chest pain subsided on the afternoon of</p> <p>24 September 17th?</p>	<p style="text-align: right;">60</p> <p>1 A. Correct.</p> <p>2 Q. She didn't think medical care, other than</p> <p>3 what she did, was necessary. You have a difference</p> <p>4 of opinion?</p> <p>5 A. Correct.</p> <p>6 Q. And what's the basis of your difference?</p> <p>7 What more was it that you wanted her to do?</p> <p>8 A. For one, she was informed by me that I take</p> <p>9 Nitroglycerin. That was denied.</p> <p>10 Q. Well, you had no shortness of breath. She</p> <p>11 thought medically you didn't need it. There was no</p> <p>12 complaints of chest pains. There was no shortness</p> <p>13 of breath. Your oxygenation was normal. Your pulse</p> <p>14 rate was normal. Your blood pressure was normal.</p> <p>15 A. That's absolutely incorrect because I</p> <p>16 informed her of the chest pains. And like I stated</p> <p>17 for the record before, the only thing that was done</p> <p>18 by Nurse McGrogan while I was at medical was a</p> <p>19 finger monitor. Now if you can monitor --</p> <p>20 Q. What else did you want her to do?</p> <p>21 A. Administer medication that I'm allowed to</p> <p>22 have.</p> <p>23 Q. So you wanted medication? That's what</p> <p>24 you --</p>
<p style="text-align: right;">59</p> <p>1 A. 17th, correct.</p> <p>2 Q. When did you have any other medical</p> <p>3 treatment for any other reason -- for any reason by</p> <p>4 any provider?</p> <p>5 A. I was seen several days in a row for the</p> <p>6 athlete's foot, for the rashes. I was prescribed</p> <p>7 the antifungal cream. I was given Motrin for the</p> <p>8 headaches. I was given antacids for the stomach</p> <p>9 problems for several days after until I was informed</p> <p>10 by the doctor -- my sick call request would no</p> <p>11 longer be accepted.</p> <p>12 Q. You had a sick call and you were seen on</p> <p>13 September 23rd for your feet. You had another sick</p> <p>14 call and you were seen on March 23rd. You were</p> <p>15 discharged from this prison to Graterford on</p> <p>16 November -- it looks like November 13th.</p> <p>17 Does that correspond with your memory?</p> <p>18 A. Pretty much.</p> <p>19 Q. What is it you wanted Nurse McGrogan to do</p> <p>20 for you that morning?</p> <p>21 A. It's what she didn't do. She didn't</p> <p>22 provide me any medical care.</p> <p>23 Q. So you wanted her to provide you with</p> <p>24 medical care? That's what you wanted?</p>	<p style="text-align: right;">61</p> <p>1 A. Correct.</p> <p>2 Q. I thought you came down there to be</p> <p>3 examined and to be checked out to see what medical</p> <p>4 needs you had? Or did you just go down looking for</p> <p>5 medication?</p> <p>6 A. As I stated before, I informed the block</p> <p>7 officer that morning that I was having chest pains.</p> <p>8 That's the only way that you can get off of the</p> <p>9 block and considered an emergency.</p> <p>10 Q. Thank you.</p> <p>11 A. Thank you.</p> <p>12 MR. FERRANTE: I don't have any</p> <p>13 other questions for you.</p> <p>14 BY MR. SHOTLAND:</p> <p>15 Q. Mr. Moore, just very briefly, was there</p> <p>16 soap in your cell?</p> <p>17 A. I'm not sure whether there was soap in the</p> <p>18 cell or not.</p> <p>19 Q. You don't know whether there was soap in</p> <p>20 your cell?</p> <p>21 A. Yeah, because some days -- when soap is</p> <p>22 handed out, some days you may go through a period of</p> <p>23 two or three days without any soap before you get</p> <p>24 your renewal.</p>

TROY LAMONT MOORE, SR.

<p style="text-align: right;">62</p> <p>1 Q. And you don't remember whether there was 2 soap in your cell? 3 A. I don't remember. 4 Q. But there was a sink in your cell? 5 A. That is correct. 6 Q. And after the toilet overflowed for the 7 first time, you went to the sink and you washed 8 yourself off as best as you could? 9 A. I splashed water in my eyes and in my mouth 10 to get the raw sewage out of my face area. 11 Q. Was there anything stopping you from 12 cleaning yourself off at the sink? 13 A. The raw sewage that was spurting out of the 14 toilet. The -- let me just give you an idea that -- 15 the sink sits over top of the toilet. 16 Q. The sink is directly over top of the 17 toilet? 18 A. Not directly. It's in the proximity over 19 the toilet. 20 Q. And at times you said the toilet was 21 overflowing every 10 minutes, but within those 10 22 minute periods it was not overflowing, correct? 23 A. Some there weren't, some there were. Like 24 I said, when the cells above me would flush their</p>	<p style="text-align: right;">64</p> <p>1 CERTIFICATION 2 3 4 I, ALEXANDRA ALVARADO, Court 5 Reporter, certify that the foregoing 6 is a true and accurate transcript of 7 the foregoing deposition, that the 8 witness was first sworn by me at the 9 time, place and on the date herein 10 before set forth. 11 I further certify that I am 12 neither attorney nor counsel for, not 13 related to nor employed by any of the 14 parties to the action in which this 15 deposition was taken; further, that I 16 am not a relative or employee of any 17 attorney or counsel employed in this 18 case, nor am I financially interested 19 in this action. 20 21 22 Alexandra Alvarado 23 Court Reporter 24 and Notary Public Dated: _____</p>
<p style="text-align: right;">63</p> <p>1 toilet within that 10 minute interval, our toilet 2 would overflow again. 3 MR. SHOTLAND: Thank you, 4 Mr. Moore. That's all I have. 5 (Witness excused.) 6 (Deposition concluded at 7 3:44 p.m.) 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>	

17 (Pages 62 to 64)

ELECTRONIC REPORTING STENOGRAPHIC AFFILIATES

Inmate Grievances		
MOORE (last) Intake	TROY (first) PID <u>853403</u>	DOB 08/20/1972
Grievance	Type	Sub-Type
G132571	MEDICAL	MEDICAL
G022150	MEDICAL	MEDICAL
Submitted	Logged	Fac. Status
10/31/2013	11/01/2013	PICC RESOLVED
11/18/2002	11/19/2002	CFCF RESOLVED
Height 6'03 Hair BLACK Sex MALE		
Weight 160 Eyes BROWN Race BLACK		
Marks:		
Languages: ENGLISH		
PgUp	PgDn	F9
GoBack	Zoom	F10
		Attnd
		IPay
		F11
		Where
		F12
		Report
		About

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Philadelphia Police Photo-id Number